

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---------------------------|---|-------------------|
| IN RE: | : | Case No. 15-18760 |
| | : | |
| Ralph D. Palm Jr., | : | |
| Debtor | : | CHAPTER 13 |
| | : | |
| Santander Bank, N.A. | : | |
| Movant | : | |
| | : | |
| vs. | : | |
| Ralph D. Palm, Jr. | : | |
| Respondent | : | |

**ANSWER TO MOTION OF SANTANDER BANK, N.A. FOR RELIEF FROM
AUTOMATIC STAY UNDER SECTION 362 PURSUANT TO BANKRUPTCY
PROCEDURE RULE 4001**

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. This averment is a conclusion of law to which no answer is required.
5. Denied. It is denied that Movant wishes to proceed with foreclosure on the mortgage because of Debtor's failure to make the monthly payment required hereunder. To the contrary, Defendant is without sufficient knowledge as to the truth or falsity of this averment, the same is therefore denied and strict proof is demanded at time of hearing if relevant.
6. Admitted.
7. Denied. This averment is a conclusion of law to which no answer is required.
8. Denied. This averment is a conclusion of law to which no answer is required.
9. Denied. This averment is a conclusion of law to which no answer is required.

10. Denied. It is denied that Movant specifically requests permission from the Honorable Court to communicate with the Debtor and Debtor's counsel to the extent necessary to comply with applicable nonbankruptcy law. To the contrary, Debtor should not have contact with Movant. Movant is always permitted to communicate with debtor's counsel.

11. Denied. This averment is a conclusion of law to which no answer is required.

WHEREFORE, Respondent respectfully requests this Court to deny Santander Bank, N.A.'s Motion for Relief from the Automatic Stay and to deny Movant's request to communicate with Debtor.

Respectfully submitted,

/s/ Paul H. Herbein, Esquire
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Dated: August 18, 2016